UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY CAMDEN VICINAGE

THE INDEPENDENCE PROJECT, INC., A New Jersey Non-Profit Corporation

Plaintiff,

VS.

Case No. 1:15-cv-07000-JBS-KMW

TD BANK, N.A.,

Defendant.

STIPULATION FOR DISMISSAL WITH PREJUDICE, WITH COURT'S RETENTION OF JURISDICTION TO ENFORCE SETTLEMENT AGREEMENT

Plaintiff and Defendant, pursuant to the Federal Rules of Civil Procedure, hereby move to dismiss this action with prejudice and without costs, a resolution of all matters in dispute having been made pursuant to a Settlement Agreement executed between the parties. The parties have stipulated in their agreement that the Court retain jurisdiction to enforce the terms and conditions of the Settlement Agreement.

Respectfully Submitted,

Asaad K. Siddiqi Esq.

McCusker, Anselmi, Rosen & Carvelli, PC

210 Park Avenue, Suite 301 Florham Park, NJ 07932 Telephone: (973) 635-6300 Facsimile: (973) 635-6363

asiddiqi@marc.law

and

John P. Fuller, Esq., pro hac vice Fuller, Fuller & Associates, P.A. 12000 Biscayne Boulevard, Suite 502

North Miami, FL 33181 Telephone: (305) 891-5199 Facsimile: (305) 893-9505 jpf@fullerfuller.com Attorneys for Plaintiff

Date: 2 2 17

/s/ Susan M. Leming

Susan M. Leming, Esq. Stephen J. DeFeo, Esq. Brown & Connery, LLP 360 Haddon Ave. PO Box 539 Westmont, NJ 08108

Telephone: (856) 854-8900 Facsimile: (856) 858-4967 sleming@brownconnery.com sdefeo@brownconnery.com Attorneys for Defendant

Date: 2/21/17